

PATENT

RECEIVED
CENTRAL FAX CENTER

SEP 13 2006

REMARKS

The Office Action dated July 14, 2006 has been received and considered. Reconsideration of the outstanding rejections in the present application is respectfully requested based on the following remarks.

Allowability of Claims 35, 36, 47, and 49

The Applicant notes with appreciation the indication at pages 8 and 9 of the Office Action that claim 49 is allowed and claims 35, 36, and 47 would be allowable if rewritten in independent form. The Applicant has opted to forgo rewriting these claims as suggested in view of the following remarks.

Obviousness Rejection of Claims 26-34 and 41-46

At page 2 of the Office Action, claims 26-34 and 41-46 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Keith (U.S. Patent No. 5,493,514) in view of Youn (U.S. Patent No. 6,466,623). This rejection is respectfully traversed.

Independent claim 26 recites the feature of "accessing a first index table comprising a plurality of entries, each entry comprising an identifier associated with a corresponding memory location storing corresponding macroblock information." With respect to this feature, the Office Action asserts that the lookup table at col. 43 of Keith is "accessed or indexed" and further that Keith discloses at the passages at col. 42, lines 11-23 and col. 42, line 66 to col. 43, line 15 the use of pointers to indicate the position of a value from the lookup table or index table of the entry of the block portion." *Office Action*, p. 3. The Applicant respectfully disagrees.

For ease of reference, the cited table of Keith is reproduced below:

Table[bit pointer]=0	for bit pointer = 0, . . . , 7
Table[bit pointer]=1	for bit pointer = 8, . . . , 15
Table[bit pointer]=2	for bit pointer = 16, . . . , 23
	etc.

Keith, col. 43, lines 4-8.

As described by Keith, “[t]his processing is based on a lookup table [reproduced above] that maps the possible bit pointer values to the values to be added to the byte pointer. The bit pointer is used as the index to the table [reproduced above].” *Keith*, col. 42, line 66 to col. 43, line 4 (emphasis added). Contrary to the assertions of the Office Action, Keith does not disclose, or even suggest, that the cited table (reproduced above) comprises a plurality of entries, each entry comprising an identifier associated with a corresponding memory location storing corresponding macroblock information as recited by claim 26. Rather, as described by Keith, the cited table “maps the possible bit pointer values to the values to be added to the byte pointer” and thus serves merely as a table to increment a byte pointer. *See also Keith*, col. 43, lines 9-16 (stating “[t]he byte pointer is then incremented by the value (2) retrieved from the lookup table [reproduced above] using the updated bit pointer (21) as the index (step 3204)”). There is no disclosure that the entries of the table of Keith comprise any identifier associated with a corresponding memory location, much less associated with a corresponding memory location storing corresponding macroblock information as recited by claim 26. The Office Action does not assert that Youn discloses or suggests this feature. Accordingly, the proposed combination of Keith and Youn fails to disclose or suggest at least the feature of “accessing a first index table comprising a plurality of entries, each entry comprising an identifier associated with a corresponding memory location storing corresponding macroblock information” as recited by claim 26.

Claim 26 further recites the feature of “accessing a first plurality of macroblock information in a first order based on identifiers accessed from a first subset of the plurality of entries of the first index table.” With respect to this feature, the Office Action again points to the lookup table of Keith reproduced above and asserts that “Keith discloses video decoding the information from the lookup table that stores data pertaining to macroblock data like quantization level and motion vector data in a certain order.” *Office Action*, p. 3. The Applicant respectfully disagrees.

As discussed above, the relied-upon table of Keith merely serves as a means for updating a byte pointer based on a bit pointer which is used as an index to the lookup table so as to determine a value to add to the byte pointer. The lookup table of Keith does not “[store] data pertaining to macroblock data” as asserted by the Office Action, nor does Keith disclose or

suggest that a plurality of macroblock information is accessed in a first order based on identifiers accessed from a subset of the plurality of entries of an index table as provided by claim 26. Youn also does not disclose or suggest this feature. Accordingly, the proposed combination of Keith and Youn also fails to disclose or suggest at least the features of "accessing a first plurality of macroblock information in a first order based on identifiers accessed from a first subset of the plurality of entries of the first index table" as recited by claim 26.

Independent claim 41 recites the features of "an index table generator having an input to receive a size indicator of a destination image and an output to provide data representative of an index table identifying a first portion of the plurality of source macroblock information to be used to generate a first destination source vector, wherein the index table is based on the size indicator of the destination image." With respect to these features, the Office Action points again to the above-reproduced table of Keith and asserts that the "lookup table is accessed or indexed to store information pertaining to identify a certain portion of plural macroblock data, and that the image size is accounted for as shown in fig. 15." *Office Action*, p. 5. The Applicant respectfully disagrees.

As a first issue, Keith does not disclose or suggest that the above-reproduced table is generated by any component of the system of Keith and thus Keith fails to disclose or suggest an index table generator having an input to receive a size indicator of a destination image and an output to provide data representative of an index table as provided by claim 41. As a second issue, Keith does not disclose or suggest that the above-reproduced table identifies a first portion of a plurality of source macroblock information to be used to generate a first destination source vector. Rather, as discussed above, the above-reproduced table of Keith merely serves as a means to increment a byte pointer based on a value indexed by a bit pointer. As a third issue, regardless of whether "the image size is accounted for as shown in fig. 15" of Keith (*Id.*), Keith fails to disclose or suggest that the above-reproduced table is based on an image size, and thus Keith fails to disclose or suggest the feature of "wherein the index table is based on the size indicator of the destination image" as recited by claim 41. The Office Action does not assert that Youn discloses or suggests any of these features, nor in fact are these features disclosed or suggested by Youn. Accordingly, the proposed combination of Keith and Youn fails to disclose or suggest at least the features of "an index table generator having an input to receive a size

indicator of a destination image and an output to provide data representative of an index table identifying a first portion of the plurality of source macroblock information to be used to generate a first destination source vector, wherein the index table is based on the size indicator of the destination image” as recited by claim 41.

The proposed combination of Keith and Youn also fails to disclose or suggest the additional features disclosed by claims 27-34 and 42-46 at least by virtue of their dependency from one of claims 26 or 41. Moreover, these claims recite additional features not disclosed or suggested by the cited references.

In view of the foregoing, it is respectfully submitted that the obviousness rejection of claims 26-34 and 41-46 is improper. Reconsideration and withdrawal of this rejection therefore is respectfully requested.

Obviousness Rejection of Claims 37-40

At page 6 of the Office Action, claims 37-40 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Keith in view of Chen (U.S. Patent No. 6,259,741). This rejection is respectfully traversed.

Independent claim 37 recites the features of “determining an index table based on a video source resolution and a video destination resolution, wherein the index table comprises a plurality of entries, each entry comprising an identifier associated with a memory location storing source macroblock information for a corresponding source macroblock.” With respect to these features, the Office Action relies on Keith as disclosing these features as described above with reference to independent claim 26. The Applicants respectfully disagree.

As noted above, Keith does not disclose, or even suggest, that the cited table (reproduced above) comprises a plurality of entries, each entry comprising an identifier associated with a corresponding memory location storing corresponding macroblock information as recited by claim 26. There is no disclosure that the entries of the table of Keith comprise any identifier associated with a corresponding memory location, much less associated with a corresponding memory location storing corresponding macroblock information as recited by claim 37. The Office Action does not assert that Chen discloses or suggests this feature. Accordingly, the

proposed combination of Keith and Chen fails to disclose or suggest at least the feature of "determining an index table based on a video source resolution and a video destination resolution, wherein the index table comprises a plurality of entries, each entry comprising an identifier associated with a memory location storing source macroblock information for a corresponding source macroblock" as recited by claim 37.

The proposed combination of Keith and Chen also fails to disclose or suggest the additional features recited by claims 38-40 at least by virtue of their dependency from claim 37. Moreover, these claims recite additional features not disclosed or suggested by the cited references.

In view of the foregoing, it is respectfully submitted that the obviousness rejection of claims 37-40 is improper. Reconsideration and withdrawal of this rejection therefore is respectfully requested.

Conclusion

The Applicant respectfully submits that the present application is in condition for allowance, and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed telephone number in order to expedite resolution of any issues and to expedite passage of the present application to issue, if any comments, questions, or suggestions arise in connection with the present application.

The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account Number 50-1835.

Respectfully submitted,



Ryan S. Davidson, Reg. No. 51,596
LARSON NEWMAN ABEL POLANSKY & WHITE, LLP
5914 West Courtyard Dr., Suite 200
Austin, Texas 78730
(512) 439-7100 (phone) (512) 439-7199 (fax)

13 September 2006
Date